

**UNITED STATE DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA

v.

HEATHER IDONI

)
)
)
)
)

**No. 3:22-CR-00327-2
JUDGE TRAUGER**

MOTION REQUESTING LEAVE OF COURT TO FILE SEALED DOCUMENT

Comes now, the defendant, Dreshion Parks, by and through undersigned counsel, pursuant to Title 18 U.S.C. § 3006A which provides for an *ex parte* application, and hereby requests leave of this Honorable Court to file a sealed motion for this Court's review. Counsel for Ms. Idoni submits that the motion is properly filed under seal and that the law specifically provides that the sealed motion be filed *ex parte*. Counsel further represents to this Court that he **will not serve** a copy of the *under seal* document on the government or codefendants.

Respectfully Submitted,

/s/ William J. Conway

WILLIAM J. CONWAY, No. 026808
214 Second Ave. N., Ste. 208
Nashville, TN 37201
(615) 263-5363
wjconway@gmail.com

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of Electronic Filing to the following:

Amanda Klopf
U.S. Attorney's Office (Nashville Office)
Middle District of Tennessee
110 Ninth Avenue South
Suite A961
Nashville, TN 37203
(615) 401-6617

This the 8th day of January, 2024.

/s/ William J. Conway